



2400 Chamber Center Dr.  
Suite 200  
P.O. Box 17534  
Ft. Mitchell, KY 41017-0534  
859.360.1123 | 859.578.3061 (Fax)

Kevin L. Murphy  
Direct: 859-578-3060  
[KMurphy@MLJfirm.com](mailto:KMurphy@MLJfirm.com)

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February 7, 2020

**VIA ECF**

Hon. Gabriel W. Gorenstein  
Chief U.S. Magistrate Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
Courtroom 6B  
New York, New York 10007-1312

MEMO ENDORSED

**Re:** *Angel Hernandez v. The Office of the Commissioner of Baseball, et al.*  
18 Civ. 9035 (JPO) (GWG)

Plaintiff Angel Hernandez ("Plaintiff") respectfully submits this letter in accordance with the Court's Orders, as stated during the October 28, 2019 discovery conference and the corresponding Minute Entry, directing the parties to propose to the Court "a schedule with a date for plaintiff to provide defendant with a listing of the specific documents he intends to use as part of his summary judgment motion and a date for defendant to respond to plaintiff's listing by identifying which if any of the identified documents will be the subject of the sealing application before Judge Oetken." *See* Minute Entry for proceedings held before Magistrate Judge Gabriel W. Gorenstein, dated October 28, 2019.

Pursuant to that Order, the parties have conferred and agreed upon the following schedule:

- Plaintiff will provide to the Defendants a list of documents and deposition excerpts, in accordance with the Court's Orders, on **February 10, 2020**.
- The Defendants will respond to that list, indicating which, if any, of the documents and deposition excerpts identified by Plaintiff "will be the subject of the sealing application before Judge Oetken" by **February 18, 2020**.

Plaintiff respectfully requests that the Court approve this proposed schedule. The Defendants consent to this proposed schedule.

The current dispositive motion deadline is March 27, 2020, which is 14 days after the close of all discovery on March 13, 2020. *See* Dkt. 28, Page 3 of 4, ¶ 11 ("[u]nless otherwise ordered by the Court, any summary judgment motion shall be filed within fourteen (14) days of the close of all discovery"). The parties are conferring further regarding summary judgment briefing, as both sides have represented that they intend to move for summary judgment.

*Granted.*

SO ORDERED: DATE 2/7/20  
  
GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE